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*Counsel for Individual and Representative Plaintiffs
and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, Sarah Silverman, and
Christopher Golden,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.
Defendant.

Michael Chabon, David Henry Hwang, Matthew
Klam, Rachel Louise Snyder, and Ayelet
Waldman,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.
Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF JOSEPH R. SAVERI IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD BE
RELATED (L.R. 3-12, 7-11)**

Case No. 3:23-cv-04663-DR

**DECLARATION OF JOSEPH R. SAVERI IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD BE
RELATED (L.R. 3-12, 7-11)**

I, Joseph R. Saveri, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner and founder of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Richard Kadrey, Sarah Silverman, and Christopher Golden in this matter (the “*Kadrey Action*”). I have personal knowledge of the matters stated herein and, if called upon, could competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiff’s Administrative Motion to Consider Whether Cases Should be Related.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint in *Chabon, et al. v. Meta Platforms Inc.*, No. 4:23-cv-04663-DR, (N.D. Cal., Sept. 12, 2023) (the “*Chabon Action*”). The Complaint asserts that Defendant Meta Platforms Inc. engaged in actions related to the creation, maintenance, and operation of LLaMA, Defendant’s large language model artificial intelligence product that Plaintiffs allege violated their rights under Direct Copyright Infringement (17 U.S.C. § 106), Vicarious Copyright Infringement (17 U.S.C. § 106), the Digital Millennium Copyright Act – Removal of Copyright Management Information (17 U.S.C. § 1202 (b)), California’s Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200, *et seq.*), and California Negligence, and Unjust Enrichment law.

3. Civil Local Rule 3-12 requires that this Administrative Motion to Consider Whether Cases Should be Related be promptly filed. The Plaintiffs in the *Chabon* Action filed their complaint on September 12, 2023.

4. This Motion is unopposed by both the Defendant Meta Platforms Inc. and the Plaintiffs in the *Chabon* Action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of September 2023 at San Francisco, California.

/s/ *Joseph R. Saveri*
Joseph R. Saveri